

EXCERPTS FROM THE DEPOSITION OF  
MARTIN VIECHA  
TAKEN AUGUST 23, 2021

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
4

5 ) Civil Action  
6 IN RE TESLA, INC. ) No. 3:18-cv  
7 SECURITIES LITIGATION ) -04865-EMC  
8 ) Page 1-234  
9

10 THIS TRANSCRIPT IS DESIGNATED CONFIDENTIAL  
11 PURSUANT TO THE PROTECTIVE ORDER  
12

13  
14 REMOTE VIDEOTAPED DEPOSITION OF MARTIN VIECHA  
15 TAKEN ON  
16 MONDAY, AUGUST 23, 2021  
17

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21  
22 Reported by:

23 BRENDA R. COUNTZ, RPR-CRR

24 CSR NO. 12563

25 JOB NO. 198694

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Remote Videotaped deposition of MARTIN VIECHA  
taken via Zoom or teleconference in Los Angeles,  
California, on Monday, August 23, 2021, before  
Brenda R. Countz, CSR No. 12563.

1 APPEARANCES OF COUNSEL:

2 (All counsel and participants present  
3 via Zoom and/or teleconference.)  
4

5 FOR THE PLAINTIFFS:

6 LEVI & KORSINSKY

7 BY: NICHOLAS PORRITT, ESQ.

8 ELIZABETH TRIPODI, ESQ.

9 KATHY AMES, ESQ.

10 1101 30th Street NW

11 Washington, D.C. 20007  
12  
13  
14  
15

16 FOR THE DEFENDANT TESLA AND THE DEPONENT:

17 COOLEY

18 BY: PATRICK GIBBS, ESQ.

19 BINGXIN WU, ESQ.

20 3175 Hanover Street

21 Palo Alto, California 94304  
22  
23  
24  
25

1 APPEARANCES (Continued)

2  
3 ALSO PRESENT:

4 BRENT JORDAN, Videographer

5 CANDACE JACKMAN, Tesla In-house Counsel

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25 JOB NO. 198694

1 LOS ANGELES, CA - MONDAY, AUGUST 23, 2021

2 9:06 A.M.

3  
4 THE VIDEOGRAPHER: Good morning,  
5 counselors. My name is Brent Jordan. I'm the  
6 Certified Legal Videographer in association with  
7 TSG Reporting, Inc. Due to the severity of the  
8 Covid-19 and following the practices of social  
9 distancing, I will not be in the same room with  
10 the witness.

11 Instead I will record this videotaped  
12 deposition remotely. The reporter, Brenda  
13 Countz, also will not be in the same room and  
14 will swear the witness remotely.

15 Do all parties stipulate to the  
16 validity of this video recording and remote  
17 swearing and that it will be admissible in the  
18 courtroom as if it had been taken following Rule  
19 30 of the Federal Rules of Civil Procedures and  
20 the State's rules where this case is pending?

21 MR. PORRITT: Yes.

22 MR. GIBBS: Yes.

23 THE WITNESS: Yes.

24 THE VIDEOGRAPHER: Thank you. This is  
25 the start of media number one in the videotape

1 deposition of Martin Viecha taken In Re The  
2 Tesla, Inc. Securities Litigation filed in the  
3 United States District Court for the Northern  
4 District of California, San Francisco Division,  
5 Case No. 3:18-cv-04865.

6 This deposition is being taken on  
7 August 23, 2021 at approximately 9:06 a.m.

8 My name is Brent Jordan. I'm the legal  
9 video specialist from TSG Reporting, Inc.  
10 headquartered at 228 East 45th Street, New York,  
11 New York. The court reporter is Brenda Countz in  
12 association with TSG Reporting.

13 Will counsel please introduce  
14 yourselves for the record.

15 MR. PORRITT: Good morning, Nicholas  
16 Porritt of Levy & Korsinsky on behalf of the  
17 Plaintiff and the class. With me are Elizabeth  
18 Tripodi and Kathy Ames.

19 MR. GIBBS: Good morning, this is  
20 Patrick Gibbs from Cooley for the Defendants and  
21 for the witness, and with me is Bing Wu also from  
22 Cooley.

23 THE VIDEOGRAPHER: Will the court  
24 reporter please swear in the witness.  
25



MARTIN VIECHA,

having been first duly sworn, was  
examined and testified as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DEPOSITION TESTIMONY  
FILED UNDER SEAL

ERRATA  
FILED UNDER SEAL

1 STATE OF CALIFORNIA ) SS

2 COUNTY OF LOS ANGELES )

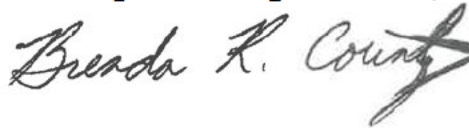
3 I, BRENDA R. COUNTZ, Certified Shorthand  
4 Reporter No. 12563 for the State of California,  
5 do hereby certify:

6 That prior to being examined, the  
7 witness named in the foregoing deposition was  
8 duly sworn to testify the truth, the whole truth,  
9 and nothing but the truth;

10 That said deposition was taken down by  
11 me in shorthand at the time and place therein  
12 named and thereafter transcribed and that the  
13 same is a true, correct, and complete transcript  
14 of said proceedings.

15 Before completion of the deposition,  
16 review of the transcript [ ] was [ ] was not  
17 requested. If requested, any changes made by the  
18 deponent during the period allowed are appended  
19 hereto.

20 I further certify that I am not  
21 interested in the outcome of the action.  
22 Witness my hand this 2nd day of September, 2021.

23 

24 \_\_\_\_\_  
25 Brenda R. Countz, CSR No. 12563